

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RICHARD TAXMAN, on Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

v.

COVIDIEN PLC, MEDTRONIC, INC., KALANI I
LIMITED, MAKANI II LIMITED, AVIATION
ACQUISITION CO., INC., AVIATION MERGER
SUB, LLC, JOSÉ E. ALMEIDA, JOY A.
AMUNDSON, CRAIG ARNOLD, ROBERT H.
BRUST, CHRISTOPHER J. COUGHLIN, RANDALL
J. HOGAN, III, DENNIS H. REILLEY, STEPHEN H.
RUSCKOWSKI, and JOSEPH A. ZACCAGNINO,

Defendants.

Case No. 1:14-cv-12949-LTS

MOTION FOR ADMISSION *PRO HAC VICE*

I, John D. Donovan, Jr., a member of the Bar of the United States District Court for the District of Massachusetts, who has entered an appearance in this action on behalf of Defendants Covidien plc, José E. Almeida, Joy A. Amundson, Craig Arnold, Robert H. Brust, Christopher J. Coughlin, Randall J. Hogan, III, Dennis H. Reilley, Stephen H. Rusckowski, and Joseph A. Zaccagnino, respectfully move this Court for admission *pro hac vice* of Rachelle Silverberg, as counsel for the above-named Defendants, pursuant to Local Rule 83.5.3(b).

Attached hereto in support of this motion is the certification of Rachelle Silverberg, attesting that she is a member in good standing in every jurisdiction where she has been admitted to practice, that there are no disciplinary proceedings pending against her, and that she is familiar with the Local Rules of this Court.

Respectfully submitted,

/s/ John D. Donovan, Jr. _____
John D. Donovan, Jr. (BBO# 130950)
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LOCAL RULE 7.1(a)(2) CERTIFICATION

In accordance with Local Rule 7.1(a)(2), attorneys for the Defendants certify that they have conferred with Plaintiff's counsel prior to filing this motion in a good faith effort to resolve the issue, and informed Plaintiff's counsel that the Defendants intended to file this Motion.

/s/ John D. Donovan, Jr. _____

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 14, 2014.

/s/ John D. Donovan, Jr. _____